

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>DARRYL STANTON</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>LAMAR CALHOUN</b>	<b>:</b>	<b>18 U.S.C. § 1951(a) (conspiracy to</b>
<b>BRYANT HIGGINBOTHAM</b>	<b>:</b>	<b>interfere with interstate commerce by</b>
<b>EBONY LESESANE</b>	<b>:</b>	<b>robbery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1951(a) (interference with</b>
	<b>:</b>	<b>interstate commerce by robbery - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (carrying and using</b>
	<b>:</b>	<b>a firearm during a crime of violence -</b>
	<b>:</b>	<b>1 count)</b>
		<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, Shop Rite, 7610 Haverford Avenue, Philadelphia, Pennsylvania, was a grocery store engaged in interstate commerce.
2. On or about July 6, 2008, in the Eastern District of Pennsylvania, defendants

**DARRYL STANTON,  
LAMAR CALHOUN,  
BRYANT HIGGINBOTHAM, and  
EBONY LESESANE**

conspired and agreed together to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, in that the defendants agreed to unlawfully take and obtain currency from a business engaged in interstate commerce, that is, Shop Rite, located at 7610 Haverford Avenue, Philadelphia, Pennsylvania, in the presence of employees of the business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in her control, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

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**MANNER AND MEANS**

It was part of the conspiracy that:

3. Defendants DARRYL STANTON, LAMAR CALHOUN, BRYANT HIGGINBOTHAM, and EBONY LESESANE planned and executed the robbery of the Shop Rite at gunpoint to obtain cash.

4. In the commission of the robbery of the Shop Rite, defendants DARRYL STANTON and LAMAR CALHOUN, and others known and unknown to the grand jury:

- a. armed themselves with a firearm;
- b. drove together to the Shop Rite; and
- c. confronted employees of the Shop Rite, brandished a firearm, and then threatened to injure and kill the employees to obtain money.

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**OVERT ACTS**

In furtherance of the conspiracy, defendants DARRYL STANTON, LAMAR CALHOUN, BRYANT HIGGINBOTHAM, and EBONY LESESANE committed the following overt acts among others, in the Eastern District of Pennsylvania:

\_\_\_\_\_ On or about July 6, 2008:

1. Defendants DARRYL STANTON, BRYANT HIGGINBOTHAM and EBONY LESESANE, who were employees of Shop Rite, met together, discussed and planned the most opportune time to rob the Shop Rite, located at 7610 Haverford Avenue in Philadelphia, Pennsylvania.

2. Defendant DARRYL STANTON met with defendant LAMAR CALHOUN and discussed the planned robbery of the Shop Rite.

3. Defendant BRYANT HIGGINBOTHAM called defendant DARRYL STANTON from the Shop Rite and told him that it was an opportune time to rob the Shop Rite.

4. Defendants DARRYL STANTON and LAMAR CALHOUN went to the Shop Rite to rob the business at gunpoint and entered the Shop Rite with a firearm pointed in the

direction of employees and customers of the Shop Rite.

5. Defendant EBONY LESESANE assisted defendants DARRYL STANTON and LAMAR CALHOUN in gathering approximately \$26,000 from a safe and placing the money in a bag.

6. Defendants DARRYL STANTON and LAMAR CALHOUN left the Shop Rite with the bag containing the money stolen from the safe.

7. Defendants DARRYL STANTON, LAMAR CALHOUN, BRYANT HIGGINBOTHAM and EBONY LESESANE later shared in the proceeds from the gunpoint robbery of the Shop Rite.

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 3, and 4 and Overt Act 1 through 7 of Count One of this indictment are incorporated here.

2. On or about July 6, 2008, in the Eastern District of Pennsylvania, defendants

**DARRYL STANTON,  
LAMAR CALHOUN,  
BRYANT HIGGINBOTHAM, and  
EBONY LESESANE**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants DARRYL STANTON, LAMAR CALHOUN, BRYANT HIGGINBOTHAM, and EBONY LESESANE unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, United States currency valued at approximately \$26,000, belonging to Shop Rite, from employees, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by brandishing a handgun at the employees.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 3 and 4, and Overt Act 1 through 7 of Count One of this indictment are incorporated here.

2. On or about July 6, 2008, in the Eastern District of Pennsylvania, defendants

**DARRYL STANTON,  
LAMAR CALHOUN,  
BRYANT HIGGINBOTHAM, and  
EBONY LESESANE**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a handgun, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery, and interference with interstate commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2.

In violation of Title 18, United States Code, Section 924(c)(1), and Title 18, United States Code, Section 2.

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**LAURIE MAGID  
Acting United States Attorney**